

Docket No. CM00441C

### REMARKS/ARGUMENTS

Applicants have amended the specification to correct a typographical error and have further amended Claims 1, 2 and 10 and have added new Claims 15 and 16. No new matter was added by these amendments. Claims 1-16 remain in the application. Applicants request reconsideration of this application in view of the above amendments and these remarks and arguments.

The Examiner has objected to the specification asking Applicants to clarify which of the SDRs is being referred to as "SDR 220" in FIG. 3. The SDR that is referred to as SDR 220 in the specification by reference to FIG. 3 is not so labeled in FIG. 3. Applicants ask the Examiner to determine whether amending FIG. 3 to add the reference number 220 to the corresponding SDR would appropriately address this objection.

The Examiner further objected to the specification asking Applicants to clarify which of the MSs being referred to as "MS 376" in FIG. 3. Applicants have amended the paragraph in the specification beginning at page 16, line 26 to delete the reference number 376 and to add the reference number 374, which is accurately reflected in FIG. 3.

The Examiner has rejected: Claims 1-4 and 7-14 under 35 U.S.C. 102(e) as being anticipated by Li, et al. WO 02/19615 A2 (which was incorrectly cited by the Examiner in the Office Action as WO 2004/047390, the citation later being correctly identified in a telephone conference between the Examiner and Applicants' attorney, Ms. Valerie M. Davis); and Claims 5 and 6 under 35 U.S.C. as being unpatentable over Li, et al. in view of Ala-Lukko US 2004/0005881. Applicants traverse these rejections because the Li reference alone or in combination with the Ala-Lukko reference fails to disclose all of the limitations recited in amended Claims 1 and 10 and included by dependency in Claims 2-9 and 11-16.

Li "solves the micro-mobility problem for mobile terminals moving within an individual radio access network (RAN) . . . [by providing] a novel micro-mobility supporting protocol suite called Wireless Internet Protocol (WIP) that enables efficient data packet forwarding and optimized routing for mobile-to-fixed, fixed-to-mobile and mobile-to-mobile communications" (page 9, lines 3-10). The entirety of the reference discloses the details of this WIP suite of three protocols termed "a Mobile Registration Protocol, a Handoff Affected Router Discovery Protocol (HARDP) and a Mobile Location Update Protocol. The Mobile Registration Protocol is

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used to register mobile terminals within a RAN while the Mobile Location Update Protocol is used to update mobile terminal reachability during a handoff. The HARDP protocol is used at network boot-up time to identify a minimal set of routers that needs to be updated when a mobile terminal handoff occurs between two neighboring radio access nodes" (page 9, lines 11-20).

Nothing in the Li reference indicates that the RAN disclosed therein comprises a system divided into a plurality of zones and having a plurality of zone controllers as is recited in Claims 1 and 10 or that the router identified in this reference are short data routers as is specifically recited in Claims 1 and 10. Moreover, Claims 1 and 10 have each been amended to recite that "at least one of the short data routers is operable to act as a short data router to serve one of the zones and to act as a back-up short data router for another short data router in at least part of another zone served by that other short data router using back-up information received in the multicast message from the at least one zone controller", said limitations not being disclosed in Li. Moreover, the Ala-Lukko reference fails to disclose these added limitations.

For these reasons, the Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney or agent at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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Attachments